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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JOSEPH HOLMES,

15 Defendant.

Case No. 2:20-mj-00902-DJA

**SECOND STIPULATION TO
MODIFY CONDITIONS OF
PRETRIAL RELEASE FOR TRAVEL**

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Kathryn
20 C. Newman, Assistant Federal Public Defender, counsel for Joseph Holmes,

21 This Stipulation is entered into for the following reasons:

22 1. Defendant Joseph Holmes made his initial appearance in this proceeding on
23 November 9, 2020, before U.S. Magistrate Judge Cam Ferenbach. ECF No. 15. Magistrate
24 Judge Ferenbach released Mr. Holmes on conditions, including a travel restriction that limited
25 his travel to the Northern District of Florida, where he resides, and the District of Nevada for
26 the purpose of court. ECF No. 22.

2. The preliminary hearing in this matter is currently set for March 15, 2020. ECF No. 30.

3. This Court previously granted Mr. Holmes' request to visit his mother for Christmas. ECF No. 26. Mr. Holmes traveled and returned without incident.

4. Mr. Holmes is requesting the Court permission to travel again to the Southern District of Florida to visit his mother in the hospital. Specifically, he is asking the Court to issue an order pursuant to 18 U.S.C. § 3142(c)(3), modifying the conditions of his pretrial release to allow him to travel permission to travel to visit his mother, Lakisha Williams, in Fort Lauderdale from February 20, 2021, through February 28, 2021. Mr. Holmes will travel by car and will stay at his mother's residence during his visit. Ms. Williams's address will be provided to Pretrial Services prior to his trip.

5. Mr. Holmes's Pretrial Services Officer has no objection to his request to travel.

6. The government has no objection to this request for modification of Mr. Holmes's conditions.

DATED this 19th day of February, 2021.

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Kathryn C. Newman
By _____
KATHRYN C. NEWMAN
Assistant Federal Public Defender

/s/ Jim W. Fang
By _____
JIM W. FANG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JOSEPH HOLMES,

7 Defendant.
8

Case No. 2:20-mj-00902-DJA

ORDER

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10 IT IS THEREFORE ORDERED that, pursuant to 18 U.S.C. § 3142(c)(3), Mr. Holmes
11 is permitted to travel from the Northern District of Florida to the Southern District of Florida
12 from February 20, 2021, through February 28, 2021, for the purpose of visiting his mother.
13 Stipulation to Modify Conditions of Pretrial Release is granted.

14 DATED this 19th day of February, 2021.

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17 UNITED STATES MAGISTRATE JUDGE
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